

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DEMOCRATIC NATIONAL COMMITTEE,
et al.

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE,
et al.

Defendants.

Civil Action No.: 81-3876 (JMV)(JBC)

**DECLARATION OF
HELEN LAUDERDALE**

Pursuant to 28 U.S.C. § 1746, I, Helen Lauderdale, declare as follows:

1. My name is Helen Lauderdale. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am a U.S. Citizen, and a resident of South Pasadena, California. I am a licensed attorney and have been practicing for over thirty years.

3. On October 30, 2016, I volunteered as a poll observer at the Albertson's grocery store located on E. Charleston Ave. in Clark County, Nevada. While volunteering inside of the voting location, I sat in a designated area next to two other observers—a woman named Onita Petersen and another woman whose name I do not know. We sat near one set of doors at the polling location, close to the check-in tables.

4. At one point during the day a man approached us and asked us whether he would be allowed to vote at the Albertsons voting location. Specifically, he explained to us that he was registered to vote in a different precinct, and he wanted to know if he could vote at Albertsons as it was not in that precinct. Ms. Petersen began to tell him that he would not be able to vote at the

Albertsons location. Because this information was incorrect, I intervened and explained to the man that he would be allowed to vote early at the Albertsons voting location.

5. On a second occasion, I also witnessed Onita provide misinformation to a voter about whether he would need an ID to vote. She told him he would need an ID or a “paper ballot,” which I understood to mean the sample ballot booklet sent to voters. I also intervened on this occasion to provide the voter with more information, so that he would not think he could only vote with an ID.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 2, 2016

Respectfully submitted,

Helen J. Lauderdale

Helen Lauderdale